

App. No. 10/500,781  
 Amendment dated September 28, 2007  
 Reply to Office Action mailed June 29, 2007

### REMARKS

This Amendment is in response to the non-final office action mailed June 29, 2007. The indication in the Office action that Claim 22 would be allowable if rewritten in independent form is noted with appreciation. Claim 22 is presently amended accordingly and its allowance is therefore solicited.

Claim 46, which depends from previously-withdrawn claim 45, has been withdrawn.

Claim 47 has been amended so as to be dependent from Claim 1; it was previously dependent on withdrawn Claim 45.

With regards to the rejection of Claim 1 and its dependents under 35 U.S.C. 102(b), it is respectfully submitted that Kitahara et al does not disclose the Applicant's claims.

In his analysis of Kitahara, the Examiner has identified the printer head 3, as shown in Figure 4, with the 'printhead' of Claim 1. However, we see from the language of the claim that the 'printhead' must be elongate, with the length of this elongate printhead orthogonal to the substrate movement direction. By contrast, the printer head 3 pictured in Figure 4 of Kitahara is quite clearly elongate parallel to the transportation direction  $D_0$ .

This is not merely a trivial feature: a printhead elongate in the substrate movement direction is significantly harder to maintain in registration with a moving substrate. For example, with reference to Figure 2, of Kitahara et al, transportation belt 18 must maintain a constant speed parallel to the printhead over the entire length of the printhead if it is to avoid errors in droplet placement. A printhead elongate orthogonal to the substrate movement direction requires that the substrate velocity parallel to the print head is constant over a much shorter length thus requiring much less complex paper handling machinery. An example of this contrast is the use of a drum 35 as pictured in Figure 6 of the present application in contrast to the belt 18 pictured in Figure 3 of Kitahara et al.

In the construction of Kitahara, the printheads are arranged into groups, with all printheads within a group being supplied with the same color of ink ([87]-[90]). Each group of printheads is distributed along an oblique line ( $L_A$ - $L_D$ ), with the groups being mutually separated in the transportation direction  $D_0$ ; this feature ensures that the printer head 3 is necessarily elongate parallel to the transportation direction  $D_0$ . The purpose of distributing the printheads along an oblique line is to interleave the nozzles of the printheads within the group as shown in Figure 5. Therefore, to adapt the device to be elongate orthogonal to the transportation direction would contradict the clear and consistent technical teaching of the document.

As a printhead elongate orthogonal to the substrate movement direction is neither taught nor suggested by the prior art it is urged that Claim 1 is patentable and its allowance therefore solicited. It is respectfully submitted that the remaining claims are patentable at least by virtue of their dependency on

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Claim 1; thus the remaining rejections under 35 U.S.C. 102(b) and 103(a) are moot and may be withdrawn.

It is believed that no fees are necessary in connection with the present Amendment. However, in the event any fees are due, kindly charge the cost thereof to our Deposit Account No. 13-2855.

Respectfully submitted,

  
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